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September 6, 2022

The Honorable Sarah L. Cave
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1670
New York, New York 10007

RE: *Monterey Bay v. Ambac, Case No. 1:19 Civ. 9193 (PGG)(SLC) (S.D.N.Y.)*
Letter Motion Re: Filing Letter Motion and Exhibits Under Seal

Dear Judge Cave:

Pursuant to Federal Rule of Civil Procedure 5.2(d), Rule I(G)(2) of Your Honor's Individual Practices, this Court's Standing Order No. 19-mc-583, and this Court's ECF Rules & Instructions (the "ECF Rules"), we write seeking the Court's approval for Plaintiffs to file under seal Plaintiffs' Letter Motion seeking Evidence of Defendants Jefferies' MBS Trading Group's Fraudulent Practices (the "Motion") and exhibits, which are being filed contemporaneously with this Letter Motion.

In support of the Motion, Plaintiffs have attached seven (7) exhibits that have been designated by Jefferies as "CONFIDENTIAL" pursuant to the Stipulated Protective Order in this case (ECF Nos. 135 and 425 the "Protective Order"). Pursuant to Paragraph 12.4 of the Protective Order, "[w]ithout written permission from the Designating Party or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record . . . any Protected Material." The Motion quotes directly from these 7 exhibits designated by Jefferies as "CONFIDENTIAL." Accordingly, Plaintiffs are filing the Motion and the exhibits to the Motion under seal and available only to "Selected Parties." (ECF Rule 6.9).

Plaintiffs will meet and confer with Jefferies, the designating party, over the next several days in order to obtain the required written permission for the public filing of a redacted version of the Motion and the sealed exhibits.

The Court's consideration is greatly appreciated.

Sincerely,

BROWN RUDNICK LLP



Lauren Tabaksblat